

EPA Comments for Proposed Title V Permit Renewal Evaluation for Air Products Manufacturing Company (Facility ID N-802, Project # N-1091430)

Comment 1

Permit Units: N-802-3-3, N-802-4-3, N-802-5-4, N-802-6-5, N-802-7-5, N-802-10-3, N-802-11-4, N-802-12-5, N-802-13-5

In the evaluation of CAM applicability for the above listed material handling and processing equipment, the District states that CAM does not apply because the equipment does not have any emission limits. Each of the above listed equipment is subject to at least one PM emission limit and a zero visible emissions standard. (For example, see Permit unit 3, conditions 14 and 6.) CAM applies if “The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof)”. In addition, the definition of “emission limitation or standard” in the CAM rule states that “An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement.” This equipment is subject to an emission limitation or standard because the units are subject to a work practice standard that limits PM emissions. The District must revise its CAM applicability determination by evaluating CAM for the above listed material handling and processing equipment.

Comment 2

Permit Unit: N-802-1-16 – Coal-fired CFB boiler

In the evaluation of CAM applicability for the above listed coal-fired boiler, the District states that a “CAM determination is not required” because the previous Title V permit determined that this unit was in compliance with CAM and continued compliance is expected. However, the evaluation for the previous Title V is not provided or specifically referenced so that it is available for review. Therefore it is not clear that this unit is subject to CAM. The district should revise its analysis to either better reference the previous CAM determination, or add the determination to this evaluation.